

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

ROSY GIRON DE REYES, *et al.*,

Plaintiffs,

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

Defendants.

Civil No.: 1:16cv563-TSE-TCB

**NOTICE OF FILING OF DEFENDANTS' MOTION TO SEAL**

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 5, Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (collectively "Defendants"), by counsel and in accordance with the Protective Order entered in this matter on August 18, 2016 (Dkt. 45) hereby gives public notice that a Motion to Seal was filed on October 14, 2016 to respectfully move this Court for entry of an Order directing that the confidential documents and information attached to and cited to in Defendants' Motion to Compel filed on October 14, 2016 be sealed. Because Plaintiffs labeled certain documents and information as confidential, Defendants' Motion to Seal respectfully moves the Court to seal the following: (1) Plaintiffs' Answers to Defendants' Requests for Admission, which is attached as Exhibit E to Defendants' memorandum in support of the Motion to Compel; and (2) a portion of Defendants' memorandum in support of Defendants' Motion to Compel which cites to Plaintiffs' Answers to Defendants' Requests for Admission.

Defendants' Motion to Seal was filed October 14, 2016 and memoranda in support of or in opposition to the motion must be filed within seven (7) days after the filing of Defendants'

Motion to Seal, and all or part of such memoranda may be designated as confidential. Further, any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the Defendants' Motion to Seal and if no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Respectfully submitted,  
WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, WAPLES PROJECT LIMITED  
PARTNERSHIP AND  
A. J. DWOSKIN & ASSOCIATES, INC.

/s/

---

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)

[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)

*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of October, 2016, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

/s/

Michael S. Dingman (VSB No. 30031)

Justin deBettencourt (VSB No. 83806)

7900 Tysons One Place

Suite 500

McLean, Virginia 22102

(703) 641-4200 (Telephone)

(703) 641-4340 (Facsimile)

[mdingman@reedsmith.com](mailto:mdingman@reedsmith.com)

[jdebettencourt@reedsmith.com](mailto:jdebettencourt@reedsmith.com)